

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WSG 128

Date Signed: August 11, 1998

MEMORANDUM

SUBJECT: Policy on Cutoff Dates for Submitting Data to SDWIS/FED

FROM: Robert J. Blanco, Director
Implementation and Assistance Division (4606)
Office of Ground Water and Drinking Water

Brian J. Maas, Director
Water Enforcement Division (2243A)
Office of Enforcement

Elliott J. Gilberg, Director
Chemical, Commercial Services and Municipal Division (2224A)
Office of Compliance

Frederick F. Stiehl, Director
Enforcement Planning, Targeting, and Data Division (2222A)
Office of Compliance

TO: Regional Water Division Directors
Regional Enforcement Division Directors

We are using SDWIS/FED data more and more for internal purposes and for public right-to-know. For example, once the SNC/Exceptions Tracking System and its reports are fully operational, OECA will be using these reports as the source of quarterly and annual reports on enforcement performance, including resolution of SNCs and exceptions. The first National Annual Compliance Report used SDWIS/FED data to prepare summary tables of state data. Data need to be timely and accurate to support rulemaking, and targeting and analysis activities, and should be consistent wherever they are used.

Data are not currently either consistent or timely. The grant eligibility schedule includes a draft report from SDWIS/FED around December 20 each year and a final report about thirty days later. Data for measuring GPRA progress (i.e., core performance measures) and for populating the Index of Watershed Indicators and the internet page for the Center for Environmental Information and Statistics are as of April 1, 1998. Data are transferred to Envirofacts at the beginning of each quarter. For the 1996 [calendar year] Annual Compliance Report, OECA used data from SDWIS as of January 1, 1998 for comparison to state data. The 1997 report will use SDWIS data as of July 1, 1998.

After consultation with your branch chiefs, we have settled on a single period of time as the lag time after which SDWIS/FED data become "official" for reporting purposes. That lag time is 90 days. A 90-day period is consistent with the "official" period of time we give states and regions to upload data to SDWIS/FED. Currently, states have 45 days to get the data to the region, the region has 15 days to get the data to HQ, and states and regions have 30 days to review the data and make corrections before the data become official. Some regions have chosen to give states 60 days and have the states transfer the data directly to SDWIS. While this schedule is our official policy, we appear to honor it in the breach more than in fact, as evidenced by the previous examples.

There is no technical reason that states can't get data in and corrected in 90 days; SDWIS/FED allows entry and correction (even for states which totally replace their data every quarter) within the 90 days. Error reports are getting smaller and documentation will be getting easier to use. Quality assurance manuals will be available in several months which will assist states and regions in improving data quality. Thus, now is a good time to reestablish the importance of entering and correcting data on time. States which argue that they cannot meet these dates are typically ones which either do not give high priority to data management and/or which have split organizational responsibility for data entry and data management. Giving states a longer period of time to enter data does not solve that problem and gives the message that timely entry of quality data (i.e., data used for decision purposes) is not of value to EPA.

Commencing October 1, 1998, we will establish 90 days as the lag time before data become official. EPA will use data from SDWIS/FED for its official reports, analyses, and public disclosure as of January 1, 1999. States will be able to enter changes to data after 90 days. Those changes will affect individual records but will not affect aggregate reporting.

The National Annual Compliance Report and discussions with USA Today reporters have raised our awareness of the problems with the quality and timeliness of SDWIS/FED data. We have pledged through the recommendations in that report to work more closely with the states to improve the quality of the data on which an evaluation of the success of the national drinking water program must rest. Please help us implement this recommendation by conveying to your states the importance of quality and timely data and working with them to achieve that goal.

cc: Regional Branch Chiefs
Regional Enforcement Coordinators
Headquarters Branch Chiefs
Cynthia Dougherty
Elizabeth Fellows
Elaine Stanley
Eric Schaeffer